

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> ¹ ,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Re: Docket No. 13120

**PRELIMINARY DESIGNATION OF FACT AND EXPERT
WITNESSES ON BEHALF OF CERTAIN ASBESTOS PROPERTY DAMAGE
CLAIMANTS OF SPEIGHTS & RUNYAN AND THE BRANDI LAW FIRM**

Speights & Runyan and The Brandi Law Firm hereby designate fact and expert witnesses as required by the Amended PD Case Management Order, Exhibit B, dated October 13, 2006 on behalf of the following listed California Property Damage Claimants: #10930-Pacific Freeholds aka 100 Pine Street; #9848-UC Berkeley-ASUC-King Union Bldg; #9849-UC Berkeley-Boalt Hall (Robbins Law Library); #9850 UC Berkeley-Calvin; #9909-UC Berkley-Campbell Hall; #9910-UC Berkeley-Davis Bldg; #9895 UC Berkeley-Eschelman Bldg; #9896 UC Berkeley-Etcheverey Bldg.; #9897 UC Berkeley-Kroeber Bldg.; #9878 UC Berkeley-Lawrence Hall; #9881-UC Berkeley-Wheeler Hall; #9879 UC Berkeley-Zellerbach Center; #9880-UC Berkeley-Zellerbach Playhouse Lobby; #9847 UC Davis-Chemistry Annex; #9846-

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Ins., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgracc, Inc., Coalgracc II, Ins., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe. Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tärpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Ins., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

UC Davis-Mrack Bldg.; #9843 UC Davis-National Primate Center; #9845-UC Davis-Physical Science Library; #9844-UC Davis-Shields Library; #9892-UC Davis Med. Center-Cypress Bldg.; #9891-UC Davis Med. Center-Hospital (East Wing and North Wing); #9890-UC Davis Med. Center-Professional Bldg.; #9869-UC Irvine-Computer Science Bldg.; #9858-UC Irvine-Engineering; #9859-UC Irvine-Medical Center Bldg 53; #9868-UC Irvine-Physical Science (Rowland Hall); #9860-UC Irvine-Science Lecture Hall; #9851-UC Los Angeles-Boelter Hall; #9852-UC Los Angeles-Hedrick Hall; #9853-UC Los Angeles-Life Sciences; #9854-UC Los Angeles-Math & Science Hallway; #9855-UC Los Angeles-Melnitz Hall; #9856-UC Los Angeles-Rieber Hall; #9857-UC Los Angeles-Sproul Hall; #9882-UC Riverside-A&I Dorms; #9883-UC Riverside-Olmstead Hall Theater; #9885 UC Riverside-Physics 2000 Theater; #9884-UC Riverside-Physics Room 2158; #9887-UC Riverside-Watkins Art Gallery; #9886-UC Riverside-Watkins House; #9840-UC San Diego-Hillcrest Hospital Emergency Dept.; #9841-UC San Diego-Humanities & Social Sciences; #9893-UC San Diego-McGill Hall (ak/a Psychology and Linguistics Bldg.); #9862-UC San Francisco-Ambulatory Care Center; #9863-UC San Francisco-Health Sciences IR East; #9865-UC San Francisco-Health Sciences IR West; #9861-UC San Francisco-Joseph M. Long Hospital (Children's Hospital); #9866-UC San Francisco-Laurel Heights; #9867-UC San Francisco-Millberry Union Bldg.; #9864-UC San Francisco-Moffitt Hospital; #9870-UC Santa Barbara-Biology II; #9871-UC Santa Barbara-Buchanan Hall; #9872-UC Santa Barbara-Campbell Hall; #9873-UC Santa Barbara-Campbell Hall Projection Room; #9874-UC Santa Barbara-Music Bldg.; #9875 UC Santa Barbara-North Hall; #9876 UC Santa Barbara-Psychology Bldg.; #9877 UC Santa Barbara-Student Health Bldg.; #9848-UC Berkeley-ASUC-King Union Bldg; #9849-UC Berkeley-Boalt Hall (Robbins Law Library); #9850 UC Berkeley-Calvin; #9909-UC Berkeley-Campbell Hall; #9910-UC Berkeley-Davis Bldg; #9895 UC Berkeley-Eschelman Bldg; #9896 UC Berkeley-Etcheverey Bldg.; #9897 UC

Berkeley-Kroeber Bldg.; #9878 UC Berkeley-Lawrence Hall; #9881-UC Berkeley-Wheeler Hall; #9879 UC Berkeley-Zellerbach Center; #9880-UC Berkeley-Zellerbach Playhouse Lobby; #9847 UC Davis-Chemistry Annex; #9846-UC Davis-Mrack Bldg.; #9843 UC Davis-National Primate Center; #9845-UC Davis-Physical Science Library; #9844-UC Davis-Shields Library; #9892-UC Davis Med. Center-Cypress Bldg.; #9891-UC Davis Med. Center-Hospital (East Wing and North Wing); #9890-UC Davis Med. Center-Professional Bldg.; #9869-UC Irvine-Computer Science Bldg.; #9858-UC Irvine-Engineering; #9859-UC Irvine-Medical Center Bldg 53; #9868-UC Irvine-Physical Science (Rowland Hall); #9860-UC Irvine-Science Lecture Hall; #9851-UC Los Angeles-Boelter Hall; #9852-UC Los Angeles-Hedrick Hall; #9853-UC Los Angeles-Life Sciences; #9854-UC Los Angeles-Math & Science Hallway; #9855-UC Los Angeles-Melnitz Hall; #9856-UC Los Angeles-Rieber Hall; #9857-UC Los Angeles-Sproul Hall; #9882-UC Riverside-A&I Dorms; #9883-UC Riverside-Olmstead Hall Theater; #9885 UC Riverside-Physics 2000 Theater; #9884-UC Riverside-Physics Room 2158; #9887-UC Riverside-Watkins Art Gallery; #9886-UC Riverside-Watkins House; #9840-UC San Diego-Hillcrest Hospital Emergency Dept.; #9841-UC San Diego-Humanities & Social Sciences; #9893-UC San Diego-McGill Hall (ak/a Psychology and Linguistics Bldg.); #9862-UC San Francisco-Ambulatory Care Center; #9863-UC San Francisco-Health Sciences IR East; #9865-UC San Francisco-Health Sciences IR West; #9861-UC San Francisco-Joseph M. Long Hospital (Children's Hospital); #9866-UC San Francisco-Laurel Heights; #9867-UC San Francisco-Millberry Union Bldg.; #9864-UC San Francisco-Moffitt Hospital; #9870-UC Santa Barbara-Biology II; #9871-UC Santa Barbara-Buchanan Hall; #9872-UC Santa Barbara-Campbell Hall; #9873-UC Santa Barbara-Campbell Hall Projection Room; #9874-UC Santa Barbara-Music Bldg.; #9875 UC Santa Barbara-North Hall; #9876-UC Santa Barbara-Psychology Bldg.; #9877-UC Santa Barbara-Student Health Bldg.

California State University claims: #10597-Chico Butte Hall, #10621-Chico Physical Science, #9888-Dominguez Hills Education Resource Center, #9838-Fresno McKee Fisk, #10319-Fresno North Gymnasium, #10303-Fresno Psychology, #9889-Fresno Science, #10053-Fullerton Humanities, #10019-Fullerton Physical Education, #10020-Fullerton PJ&G Pollak Library, #10058-Fullerton Performing Arts, #11962-Hayward Meikle John Hall, #11957-Hayward Music & Business, #9839-Humboldt Forbes PE Complex, #9842-Humboldt Natural Resources Bldg, #10237-Long Beach Main Library, #12616-Long Beach University Theatre, #10018-Pomona Gymnasium (Kellogg), #10078-Pomona Darlene May Gym, #9988-Sacramento Alpine Hall, #9970-Sacramento Kadema Hall, #9928-San Diego Art II, #9925-San Diego -- Aztec Center, #10230-San Diego East Commons and East Commons Addition, #9993-San Diego -- West Commons, #10160-San Francisco Hensill Hall, #11918-San Jose Cafeteria, #11735-San Luis Obispo Administration, #11819-San Luis Obispo Engineering West and Engineering West Addition, #11817-San Luis Obispo Farm Shop, #11802-San Luis Obispo Mott Physical Education, #11800-San Luis Obispo Research & Development, #11745-San Luis Obispo Transportation, #11876-Stanilaus Drama, #11866-Stanilaus Music.

**Preliminary Fact and Expert Witnesses Designation
Regents of the University of California**

Fact Witnesses

1. Subject to its reservation of rights, claimant may offer testimony of Cliff Bowen. The subject matter and substance of Mr. Bowen's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

2. Subject to its reservation of rights, claimant may offer testimony of George Getgen. The subject matter and substance of Mr. Getgen's testimony is Product Identification,

including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

3. Subject to its reservation of rights, claimant may offer the deposition testimony of Kevin Fay taken in In re: Asbestos Schools Litigation on November 30, 1988. The subject matter and substance of Mr. Fay's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

4. Subject to its reservation of rights, claimant may offer the deposition testimony of John Welch taken in In re: Asbestos Schools Litigation on November 6, 17 and 18, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

5. Subject to its reservation of rights, claimant may offer the deposition testimony of Kenneth Millian taken in County of Jasper/Blue Cross Blue Shield of SC v. W. R. Grace & Co. on February 21 and October 26, 1990. The subject matter and substance of Mr. Millian's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

6. Subject to its reservation of rights, claimant may offer the deposition testimony of Edlu Thom taken in County of Jasper v. W. R. Grace & Co. on February 22, 1990. The subject matter and substance of Mr. Thom's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

7. Subject to its reservation of rights, claimant may offer the deposition testimony of Carolyn Tieger taken in In re: Asbestos Schools Litigation on November 29, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

8. Subject to its reservation of rights, to the extent that the Debtors dispute the authenticity of admissibility of their own documents and records, claimant reserves the right to call or designate the deposition testimony of Grace representatives regarding the source, content and authenticity of Grace's own records.

Expert Witnesses

1. Subject to its reservation of rights, claimant identifies William E. Longo or another representative of Material Analytical Services, Inc., 3945 Lakefield Court Suwanee, GA 30024. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

2. Subject to its reservation of rights, claimant identifies Bill Ewing or another representative of Compass Environmental, 1751 McCollum Parkway, NW, Kennesaw GA 30144-5908. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

3. Subject to its reservation of rights, claimant identifies Todd Dawson. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

California State University System

Fact Witnesses

1. Claimant will designate a person to testify on the subjects listed in the adjacent column to the extent that such testimony cannot be provided by expert witness testimony. Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

2. Subject to its reservation of rights, claimant may offer the deposition testimony of Kevin Fay taken in In re: Asbestos Schools Litigation on November 30, 1988. The subject matter and substance of Mr. Fay's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

3. Subject to its reservation of rights, claimant may offer the deposition testimony of John Welch taken in In re: Asbestos Schools Litigation on November 6, 17 and 18, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

4. Subject to its reservation of rights, claimant may offer the deposition testimony of Kenneth Millian taken in County of Jasper/Blue Cross Blue Shield of SC v. W. R. Grace & Co. on February 21 and October 26, 1990. The subject matter and substance of Mr. Millian's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

5. Subject to its reservation of rights, claimant may offer the deposition testimony of Edlu Thom taken in County of Jasper v. W. R. Grace & Co. on February 22, 1990. The subject matter and substance of Mr. Thom's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

6. Subject to its reservation of rights, claimant may offer the deposition testimony of Carolyn Tieger taken in In re: Asbestos Schools Litigation on November 29, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

7. Subject to its reservation of rights, to the extent that the Debtors dispute the authenticity of admissibility of their own documents and records, claimant reserves the right to call or designate the deposition testimony of Grace representatives regarding the source, content and authenticity of Grace's own records.

Expert Witnesses

1. Subject to its reservation of rights, claimant identifies ACC Environmental Consultants. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

2. Subject to its reservation of rights, claimant identifies William E. Longo or another representative of Material Analytical Services, Inc., 3945 Lakefield Court Suwanee, GA 30024. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

3. Subject to its reservation of rights, claimant identifies Bill Ewing or another representative of Compass Environmental, 1751 McCollum Parkway, NW, Kennesaw GA 30144-5908. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as

well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

4. Subject to its reservation of rights, claimant identifies Todd Dawson. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

5. Subject to its reservation of rights, claimant identifies Certified Testing Laboratories. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

6. Subject to its reservation of rights, claimant identifies Baker Consultants. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

7. Subject to its reservation of rights, claimant identifies Patrick Mulligan. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

8. Subject to its reservation of rights, claimant identifies Ian Currie. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

9. Subject to its reservation of rights, claimant identifies Joyce Kerley. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

10. Subject to its reservation of rights, claimant identifies Alex Kremer. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

11. Subject to its reservation of rights, claimant identifies James Fointinella. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

12. Subject to its reservation of rights, claimant identifies Stewart Salot. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures,

methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

13. Subject to its reservation of rights, claimant identifies Paul Jordan. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

14. Subject to its reservation of rights, claimant identifies Jesus Mallari. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

15. Subject to its reservation of rights, claimant identifies Santra Plumleigh. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

16. Subject to its reservation of rights, claimant identifies Louis Ortiz. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

17. Subject to its reservation of rights, claimant identifies Bill Hutton. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace

products including information regarding sampling and testing performed as well as procedures, methodology, and results. This testimony will, necessarily, include factual testimony regarding these topics as well.

Pacific Freeholds - 100 Pine

Fact Witnesses

1. Subject to its reservation of rights, claimant may offer testimony of Laurie Wilson. The subject matter and substance of Ms. Wilson's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

2. Subject to its reservation of rights, claimant may offer testimony of Gerry Zalkovsky. The subject matter and substance of Mr. Zalkovsky's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

3. Subject to its reservation of rights, claimant may offer testimony of Thomas Walker, Lafayette, CA. The subject matter and substance of Mr. Walker's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

4. Subject to its reservation of rights, claimant may offer testimony of Ellen Hansen. The subject matter and substance of Ms. Hansen's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues

including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

5. Subject to its reservation of rights, claimant may offer testimony of Frank Juszych. The subject matter and substance of Mr. Juszych's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

6. Subject to its reservation of rights, claimant may offer testimony of Ralph Hayward. The subject matter and substance of Mr. Hayward's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

7. Subject to its reservation of rights, claimant may offer testimony of Phillip Slatin. The subject matter and substance of Mr. Slatin's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

8. Subject to its reservation of rights, claimant may offer testimony of Janet Jolly. The subject matter and substance of Ms. Jolly's testimony is Product Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

9. Subject to its reservation of rights, claimant may offer testimony of Joyce Bostrom. The subject matter and substance of Ms. Bostrom's testimony is Product

Identification, including when claimant first learned of identity of the Grace products. Statute of Limitations issues including information regarding contamination by asbestos from Grace products as well as actions taken to minimize asbestos exposure.

10. Subject to its reservation of rights, claimant may offer the deposition testimony of Kevin Fay taken in In re: Asbestos Schools Litigation on November 30, 1988. The subject matter and substance of Mr. Fay's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

11. Subject to its reservation of rights, claimant may offer the deposition testimony of John Welch taken in In re: Asbestos Schools Litigation on November 6, 17 and 18, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

12. Subject to its reservation of rights, claimant may offer the deposition testimony of Kenneth Millian taken in County of Jasper/Blue Cross Blue Shield of SC v. W. R. Grace & Co. on February 21 and October 26, 1990. The subject matter and substance of Mr. Millian's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

13. Subject to its reservation of rights, claimant may offer the deposition testimony of Edlu Thom taken in County of Jasper v. W. R. Grace & Co. on February 22, 1990. The subject matter and substance of Mr. Thom's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

14. Subject to its reservation of rights, claimant may offer the deposition testimony of Carolyn Tieger taken in In re: Asbestos Schools Litigation on November 29, 1988. The subject matter and substance of Mr. Welch's testimony are fully set forth in the deposition transcript and exhibits attached thereto.

15. Subject to its reservation of rights, to the extent that the Debtors dispute the authenticity of admissibility of their own documents and records, claimant reserves the right to call or designate the deposition testimony of Grace representatives regarding the source, content and authenticity of Grace's own records.

Expert Witnesses

1. Subject to its reservation of rights, claimant identifies Pickering Environmental Consultants, Inc. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

2. Subject to its reservation of rights, claimant identifies Crawford/FPE. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

3. Subject to its reservation of rights, claimant identifies Clayton Environmental. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

4. Subject to its reservation of rights, claimant identifies Gobbel-Hayes Partners. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as

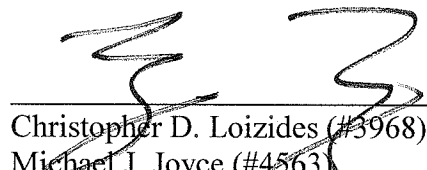
procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

5. Subject to its reservation of rights, claimant identifies Barry Mitchem. Product Identification and Statute of Limitations issues arising from sampling and testing of Grace products including information regarding sampling and testing performed as well as procedures, methodology, and results. This expert testimony will, necessarily, include factual testimony regarding these topics as well.

Reservation of Rights

The claimants it represents reserve the right to supplement or amend its preliminary witness lists, witness disclosures, deposition designations, expert reports or other disclosures as new or additional information may become available, or as may be permitted by the applicable rules of procedure or the Court. Specifically, claimants note that the Statute of Limitations is an affirmative defense which the Debtors bear the burden of proving. Therefore, claimants specifically reserve their rights to amend, supplement or add additional witnesses in response to the evidence or witnesses disclosed by the Debtors. Additionally, the claimants it represents further reserve the right to name or present new or additional fact or expert witnesses in rebuttal of any fact or expert witness identified by the Debtors.

DATED: November 6, 2006



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